

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-20110-CR-GAYLES/GOODMAN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL JOSE DULFO, *et. al.*,

Defendant(s).

DEFENDANT DULFO'S UNOPPOSED
MOTION TO CONTINUE TRIAL DATE

COMES NOW the Defendant, MICHAEL JOSE DULFO by and through undersigned counsel, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, and Rule 7.1 of the Local Rules of the Southern District of Florida and moves this Honorable Court to grant his unopposed motion to continue the trial date. In support of the motion, the Defendant states:

1. MICHAEL JOSE DULFO (Defendant/Mr. Dulfo) is charged by indictment with conspiracy to commit stalking, stalking, use of interstate facility in aid of racketeering, arson, and use of fire in furtherance of a felony. (DE 24).
2. This Honorable Court has set trial for Monday, May 6, 2024, at 9 a.m., and this Court set a calendar call for Wednesday, May 1, 2024, at 9:30 a.m. (DE 38).
3. The discovery in the instant case as to all defendants is voluminous, and the Defendants will need significant additional time to review the discovery and be adequately prepared for trial.
4. To be adequately prepared for trial, Mr. Dulfo is seeking a 60-day delay of the presently scheduled trial period. This is the first request for a continuance in this cause.

5. The undersigned has conferred with Attorneys Kate Taylor (counsel for Defendant Jerren Keith Howard) and Robyn Blake (counsel for Defendant Edner Etienne), both of whom represented that they are unopposed and join this motion to continue. Undersigned counsel attempted to confer with Attorney Dennis Gonzalez (counsel for Defendant Bayron Bennett) regarding his position, but the undersigned was unsuccessful.

6. Undersigned counsel also conferred with Assistant United States Attorney Ignacio Vazquez, and Mr. Vazquez stated that the government is unopposed to the proposed delay.

7. This motion is filed in absolute good faith and not for purposes of trivial delay nor to simply frustrate the prosecution of this matter.

8. A proposed Order is also filed with this motion, and a copy is being sent separately to chambers in Word format.

WHEREFORE, Defendant Michael Jose Dulfo and his co-defendants, through their respective counsel, respectfully request that this Honorable Court grant the instant motion and continue the presently scheduled trial date and calendar call.

Respectfully submitted,

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/s/ /Paul J. Donnelly/
PAUL J. DONNELLY
Florida Bar No. 963895

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of April 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF and a copy was sent via U.S. mail to Defendant Michael Dulfo. All parties to the instant case were served with this motion by being recipients to filings in this case via CM/ECF.

/s/ /Paul J. Donnelly/
PAUL J. DONNELLY